

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

DEBORAH CHIN, Individually and On
Behalf of All Others Similarly Situated,

Plaintiff,

v.

SONUS NETWORKS, INC., HASSAN
AHMED, PH.D. and STEPHEN NILL,

Defendants.

MICHELLE TREBITSCH, On Behalf Of
Herself and All Others Similarly Situated,

Plaintiff,

v.

SONUS NETWORKS, INC., HASSAN M.
AHMED, and STEPHEN J. NILL,

Defendants.

INFORMATION DYNAMICS, LLC, On
Behalf of Itself and All Others Similarly
Situated,

Plaintiff,

v.

SONUS NETWORKS, INC., PAUL R.
JONES, EDWARD N. HARRIS, J.
MICHAEL O'HARA, HASSAN M.
AHMED and STEPHEN J. NILL,

Defendants.

Civil Action No. 04-CV-10294 DPW

Civil Action No. 04-CV-10307 DPW

Civil Action No. 04-CV-10308 DPW

[Additional Captions Follow on Next Page]

**DECLARATION OF MICHAEL T. MATRAIA IN SUPPORT OF JAMES M.
BROWER'S MOTION FOR CONSOLIDATION, APPOINTMENT AS LEAD
PLAINTIFF, AND FOR APPROVAL OF CHOICE OF LEAD COUNSEL**

**PETER KALTMAN, On Behalf of Himself
and All Others Similarly Situated,**

Plaintiff,

Civil Action No. 04-CV-10309 DPW

v.

**SONUS NETWORKS, INC., RUBEN
GRUBER, HASSAN AHMED and
STEPHEN NILL,**

Defendants.

**SAMANTHA DEN, Individually and On
Behalf of All Others Similarly Situated,**

Plaintiff,

Civil Action No. 04-CV-10310 DPW

v.

**SONUS NETWORKS, INC., HASSAN M.
AHMED, and STEPHEN J. NILL,**

Defendants.

**RICHARD CURTIS, Individually And on
Behalf of All Others Similarly Situated,**

Plaintiff,

Civil Action No. 04-CV-10314 MLW

v.

**SONUS NETWORKS, INC., HASSAN M.
AHMED, and STEPHEN J. NILL,**

Defendants.

[Additional Captions Follow on Next Page]

RONALD KASSOVER, on Behalf of the
Ronald Kassover IRA and All Others
Similarly Situated,

Plaintiff,

v.

SONUS NETWORKS, INC., HASSAN M.
AHMED, and STEPHEN J. NILL,

Defendants.

Civil Action No. 04-CV-10329 DPW

STEVE L. BAKER, Individually and On
Behalf of All Others Similarly Situated,

Plaintiff,

v.

SONUS NETWORKS, INC., HASSAN
AHMED, PH.D. and STEPHEN NILL,

Defendants.

Civil Action No. 04-CV-10333 DPW

MICHAEL KAFFEE, Individually and On
Behalf of All Others Similarly Situated,

Plaintiff,

v.

SONUS NETWORKS, INC., HASSAN
AHMED, PH.D. and STEPHEN NILL,

Defendants.

Civil Action No. 04-CV-10345 DPW

[Additional Captions Follow on Next Page]

HAIMING HU, Individually and On Behalf of All Others Similarly Situated,

Plaintiff,

v.

SONUS NETWORKS, INC., HASSAN AHMED, PH.D. and STEPHEN NILL,

Defendants.

Civil Action No. 04-10346 DPW

CHARLES STARBUCK, Individually and On Behalf of All Others Similarly Situated,

Plaintiff,

v.

SONUS NETWORKS, INC., HASSAN AHMED, PH.D. and STEPHEN NILL,

Defendants.

Civil Action No. 04-CV-10362 DPW

SAMUEL HO, Individually and On Behalf of All Others Similarly Situated,

Plaintiff,

v.

SONUS NETWORKS, INC., HASSAN AHMED, PH.D. and STEPHEN NILL,

Defendants.

Civil Action No. 04-CV-10363 DPW

[Additional Captions Follow on Next Page]

JEFFREY C. RODRIGUES, Individually
and On Behalf of All Others Similarly
Situated,

Plaintiff,

v.

SONUS NETWORKS, INC., HASSAN M.
AHMED, and STEPHEN J. NILL,

Defendants.

Civil Action No. 04-CV-10364 DPW

ROBERT CONTE and MARK RESPLER,
Themselves and On Behalf of All Others
Similarly Situated,

Plaintiff,

v.

SONUS NETWORKS, INC., HASSAN
AHMED, PH.D. and STEPHEN NILL,

Defendants.

Civil Action No. 04-CV-10382 DPW

WHEATON ELECTRICAL SERVICES
RETIREMENT 401K PROFIT SHARING
PLAN, On Behalf of Itself and All Others
Similarly Situated,

Plaintiff,

v.

SONUS NETWORKS, INC., HASSAN
AHMED, and STEPHEN NILL,

Defendants.

Civil Action No. 04-CV-10383 DPW

[Additional Captions Follow on Next Page]

BRIAN CLARK, Individually and On Behalf of All Others Similarly Situated,

Plaintiff,

v.

SONUS NETWORKS, INC., PAUL R. JONES, EDWARD N. HARRIS, J. MICHAEL O'HARA, HASSAN M. AHMED and STEPHEN J. NILL,

Defendants.

Civil Action No. 04-CV-10454 DPW

SHEILA BROWNELL, Individually and On Behalf of All Others Similarly Situated,

Plaintiff,

v.

SONUS NETWORKS, INC., HASSAN AHMED, PH.D. and STEPHEN NILL,

Defendants.

Civil Action No. 04-CV- 10597 DPW

SAVERIO PUGLIESE, On Behalf of Himself and All Others Similarly Situated,

Plaintiff,

v.

SONUS NETWORKS, INC., HASSAN M. AHMED, and STEPHEN J. NILL,

Defendants.

Civil Action No. 04-CV-10612 DPW

[Additional Captions Follow on Next Page]

DAVID V. NOCITO, On Behalf of
Himself and All Others Similarly Situated,

Plaintiff,

v.

SONUS NETWORKS, INC., HASSAN M.
AHMED, and STEPHEN J. NILL,

Defendants.

Civil Action No. 04-CV-10623 DPW

I, Michael T. Matraia, under the pains and penalties of perjury, declare and

say:

1. I am a partner with the law firm of Berman DeValerio Pease Tabacco Burl & Pucillo ("Berman DeValerio"), One Liberty Square, Boston, MA 02109, counsel for proposed Lead Plaintiff, James M. Brower. I submit this Declaration in support of Mr. Brower's motion for appointment as Lead Plaintiff and to approve his selection of Lead Counsel.

2. On February 12, 2004, pursuant to Section 78u-4(a)(3)(A)(i) of the Private Securities Litigation Reform Act ("PSLRA"), the law firm of Cauley Geller Bowman & Rudman, LLP caused a press release to be published over PR Newswire, a national business-oriented wire service, notifying members of the proposed class of their right to move to serve as lead plaintiff by no later than sixty (60) days from the date of publication of the notice. The press releases were reprinted verbatim by *Bloomberg Business News*, *Yahoo* and *Westlaw*. Attached hereto as Exhibit A is a true and accurate copy of those notices.

3. PR Newswire is an electronic distributor of corporate, association and institutional news releases to the media and the financial community. PR Newswire distributed the Notices to more than 2,000 different news outlets, including *Bloomberg Business News*, *Dow Jones News Retrieval*, *Associated Press*, and *Reuters*.

4. James M. Brower completed a certification form in accordance with Section 78u-4(a)(3)(B)(iii)(I)(aa) of the PSLRA. Attached hereto as Exhibit B is a true and accurate copy of his certification.

5. The "mean" or average closing price for Sonus Networks, Inc.'s common stock during the period March 27, 2004 through April 8, 2004 was approximately \$3.94 per share. Attached as Exhibit C is a true and accurate copy of the Sonus' common stock price chart for the period March 27, 2004 through April 8, 2004.

6. During the Class Period, James M. Brower suffered losses of approximately \$400,874.88 on his investment in Sonus. Attached as Exhibit D is a table calculating the losses for Mr. Brower in Sonus.

7. A true and accurate copy of Berman DeValerio Pease Tabacco Burt & Pucillo's firm resume is annexed hereto as Exhibit E.

Signed under the pains and penalties of perjury this 12th day of April, 2004.



Michael T. Matraia